

First, please note that I attempted to send a comment last week, but am not sure it went through, so I am resending today.

On behalf of our members, who are small business construction subcontractors, I write to urge you to rescind the regulations that would require that associations get written permission from members before faxing material that informs them of programs, products or services available to them. In the context of member associations, such a regulation does not make sense. One of the primary reasons business professionals join trade association is to have access to member programs, products and services, and the very act of joining the association is in effect giving permission to the association to send information. In fact, it might even be considered an overt *request* for the association to send information.

Not one of our members has ever complained about receiving information from us by fax or any other form. In our industry (construction), most daily business communication is conducted by fax (or e-mail); it is the industry “standard” and not only gets the most attention, but also gets the best response – because it is efficient, timely, and requires minimal time and effort to review and respond.

Furthermore, we know from experience that it will be VERY difficult – in fact IMPOSSIBLE – to get written permission from all members; in 20 years of association experience, I have never seen 100% response to ANYTHING. To achieve it would mean physically visiting members in person and putting the pen in their hands – which is entirely impractical.

In short, this regulation is impractical, unrealistic and unnecessary, and we urge you to reconsider it.

Sincerely,

Monica Lawton  
Executive Director  
Associated Subcontractors of Massachusetts, Inc.